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REC'D TN
REGULATORY AUTH

May 31, 2002

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OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

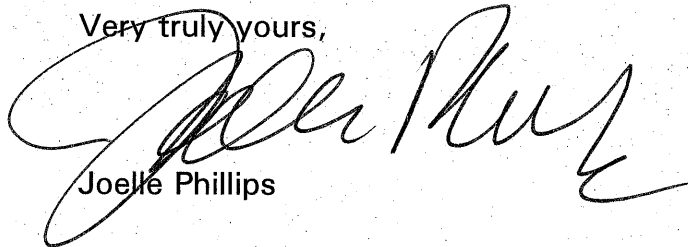
Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case
Proceeding to Declare Switching an Unrestricted Unbundled Network
Element*

Docket No. 02-00207

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Objections to UNE-P Coalitions' First Set of Data Requests. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Joelle Phillips

JP:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to Declare Switching an Unrestricted Unbundled Network Element*

Docket No. 02-00207

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS
TO UNE-P COALITION'S FIRST SET OF DATA REQUESTS**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following objections to the First Data Requests served by the UNE-P Coalition on May 24, 2002.

GENERAL OBJECTIONS

BellSouth makes the following general objections to UNE-P Coalition's ("the Coalition's") First Data Requests:

1. BellSouth objects to each Data Request to the extent that it seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on grounds that such requests are irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by the applicable rules in discovery.

2. BellSouth has interpreted the Data Requests to apply to BellSouth's regulated intrastate operations in Tennessee and will limit its responses accordingly. To the extent that any Data Request is intended to apply to matters other than Tennessee intrastate operations subject to the jurisdiction of the

Authority, BellSouth objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each Data Request to the extent that it calls for information that is exempt from discovery by virtue of the attorney client privilege, the work product doctrine, or other applicable privilege.

4. BellSouth objects to each Data Request to the extent that it seeks information that is not relevant to any issue in this proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence.

5. BellSouth objects to each Data Request to the extent that it is overly broad and unduly burdensome.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections, BellSouth also responds to the Coalition's Data Requests with Specific Objections as follows:

REQUEST NO. 1.a.:

Please provide, in electronic spreadsheet form, for the most recent month for which data is available, a listing of each central office in Tennessee identified by CLLI Code and name, indicating for each central office:

- i. The number of unbundled local loops without switching provided to requesting carriers;
- ii. The number of unbundled loops with switching (i.e. UNE-P lines) provided to requesting carriers;
- iii. The number of customer lines provided to requesting carriers through resale.

OBJECTION: BellSouth objects to Request No. 1.a. to the extent that it seeks to require BellSouth to provide any information in any format other than the

format in which BellSouth maintains such information in the ordinary course of its business.

REQUEST NO. 1.b.:

Please provide the same information requested in Request 1.a. above, in the same format, for the month one year prior to the month for which data was provided in response to Request 1.a.

OBJECTION: BellSouth objects to Request No. 1.a. to the extent that it seeks to require BellSouth to provide any information in any format other than the format in which BellSouth maintains such information in the ordinary course of its business.

REQUEST NO. 3.a.:

Provide, for the most recent period available, a distribution of BellSouth business customers in Tennessee in the following format:.

Number of Lines	Customers	Customer Locations
3 or fewer lines		
4 lines		
5 lines		
6 lines		
7 lines		
8 lines		
9 lines		
10 lines		
11 lines		
12 lines		
13 lines		
14 lines		
15 lines		
16 lines		
17 lines		

18 lines		
19 lines		
20 lines		
21 lines		
22 lines		
23 lines		
24 lines		
25 or more lines		

OBJECTION: BellSouth objects to Request No. 3a to the extent that it seeks to require BellSouth to provide any information in any format other than the format in which BellSouth maintains such information in the ordinary course of its business. BellSouth further objects to the Request to the extent that it purports to require BellSouth to produce information at any level of detail that differs from the level of detail at which BellSouth maintains such information in the ordinary course of its business.

REQUEST NO. 3.b.:

Please provide the same information requested in Request 3.a., in the same format, but for customers served by the central offices identified in response to Request 2 (i.e. for customers in access density zone 1 of the Nashville MSA).

OBJECTION: BellSouth objects to Request No. 3b to the extent that it seeks to require BellSouth to provide any information in any format other than the format in which BellSouth maintains such information in the ordinary course of its business. BellSouth further objects to the Request to the extent that it purports to require BellSouth to produce information at any level of detail that differs from the

level of detail at which BellSouth maintains such information in the ordinary course of its business.

REQUEST NO. 5.:

Provide all documents used to obtain management approval for the "BellSouth Connect and Grow Promotion" (i.e., BellSouth's promotion that required the customer to upgrade to a four-line package).

OBJECTION: BellSouth objects to Request No. 5 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 6.:

Provide all documents used to train sales and/or marketing personnel, including sales scripts, that describe or address the "BellSouth Connect and Grow Promotion."

OBJECTION: BellSouth objects to Request No. 6 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 7.:

Identify all terms, conditions, discounts and prices that comprised the "BellSouth Connect and Grow Promotion."

OBJECTION: BellSouth objects to Request No. 7 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 8.:

Please supply all tariff references (and copies of relevant tariff pages) that described the "BellSouth Connect and Grow Promotion." If this promotion was not tariffed, why was it not a tariffed offering?

OBJECTION: BellSouth objects to Request No. 8 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 9.:

With respect to the "BellSouth Connect and Grow Promotion" in Tennessee:

- (a) When was the "BellSouth Connect and Grow Promotion" offered in Tennessee?
- (b) How many customers subscribed to the "BellSouth Connect and Grow Promotion" in Tennessee?
- (c) Does BellSouth still offer the "BellSouth Connect and Grow Promotion" in Tennessee?

OBJECTION: BellSouth objects to Request No. 9 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 10.:

Identify each of the CLEC switches in the Nashville MSA that BellSouth believes to be in operation.

OBJECTION: BellSouth objects to Request No. 10 on the grounds that BellSouth objects to Request No. 10 on the grounds that the information sought is obtainable from some other source that is more convenient, less burdensome, or less expensive. BellSouth further objects to this request on the grounds that if the

Coalition wants to identify each of the CLEC switches in the Nashville MSA that are in operation, the Coalition can and should use the procedural devices that are available to it to obtain this information directly from CLECs.

REQUEST NO. 11.:

Please provide copies of all documents prepared by BellSouth related to hot cuts and loop provisioning, including without limitation time-and-motion studies and similar analyses.

OBJECTION: BellSouth objects to Request No. 11 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 12.:

How much time does BellSouth assume, for planning and workload management purposes, it will take a technician to complete a "hot-cut" for a single analog line customer? If a customer has multiple lines, how is the time to complete the hot-cut estimated?

OBJECTION: BellSouth objects to Request No. 12 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 13.:

How many BellSouth employees in Tennessee are trained to perform "hot-cuts"?

OBJECTION: BellSouth objects to Request No. 13 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

REQUEST NO. 14.:

In 2001, what was BellSouth's churn rate in Tennessee for (1) residential customers, (2) single-line business customers, and (3) businesses customers with between two and 24 voice lines, inclusive.

OBJECTION: BellSouth objects to Request No. 14 on the grounds that information sought by this request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

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A handwritten signature in cursive script, appearing to read "Julie Phillips", is written over a horizontal line.